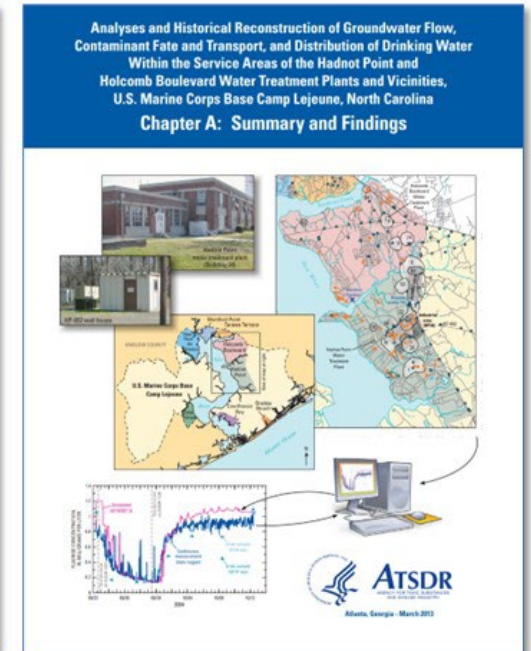
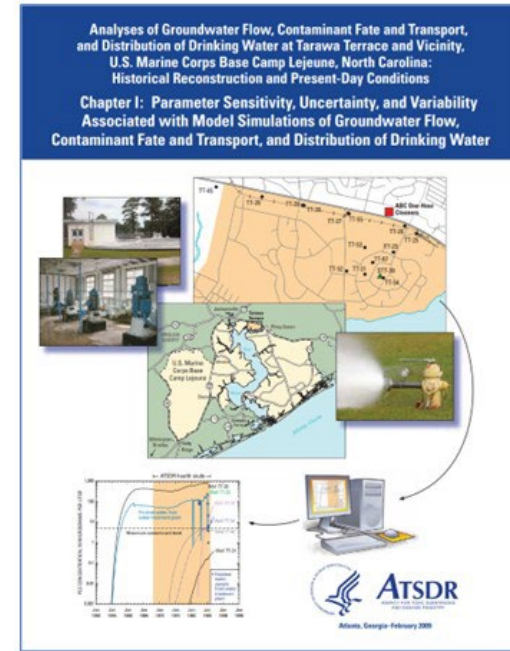


EXHIBIT 2

ATSDR Water Model Project

- ATSDR Water Model Project consists of all material associated with the creation of the Tarawa Terrace and Hadnot Point/Holcomb Blvd water models which include:
 - Both site's water model input & output files
 - Geographic Information System (GIS) Project
 - Multiple document collections
 - Research material & other documents/data relied upon to create the models
- The water model projects represent thousands to tens of thousands of individual files

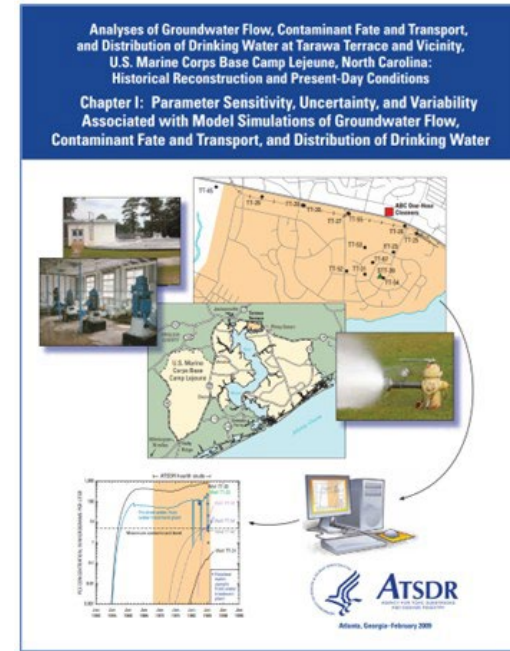
ATSDR Water Model Project



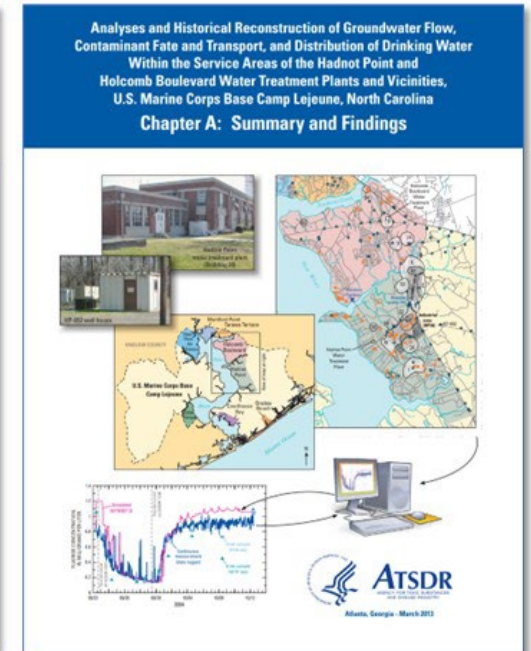
ATSDR Water Model Project

- Plaintiff's consultants and experts need to be able to have access to the ATSDR Water Model Project in its original form to allow them to:
 - Evaluate and fully understand the methodology the ATSDR scientists used in developing the model
 - Evaluate the model's input and output files
- The only way this can be accomplished is to have the Project in its original form

ATSDR Water Model Project

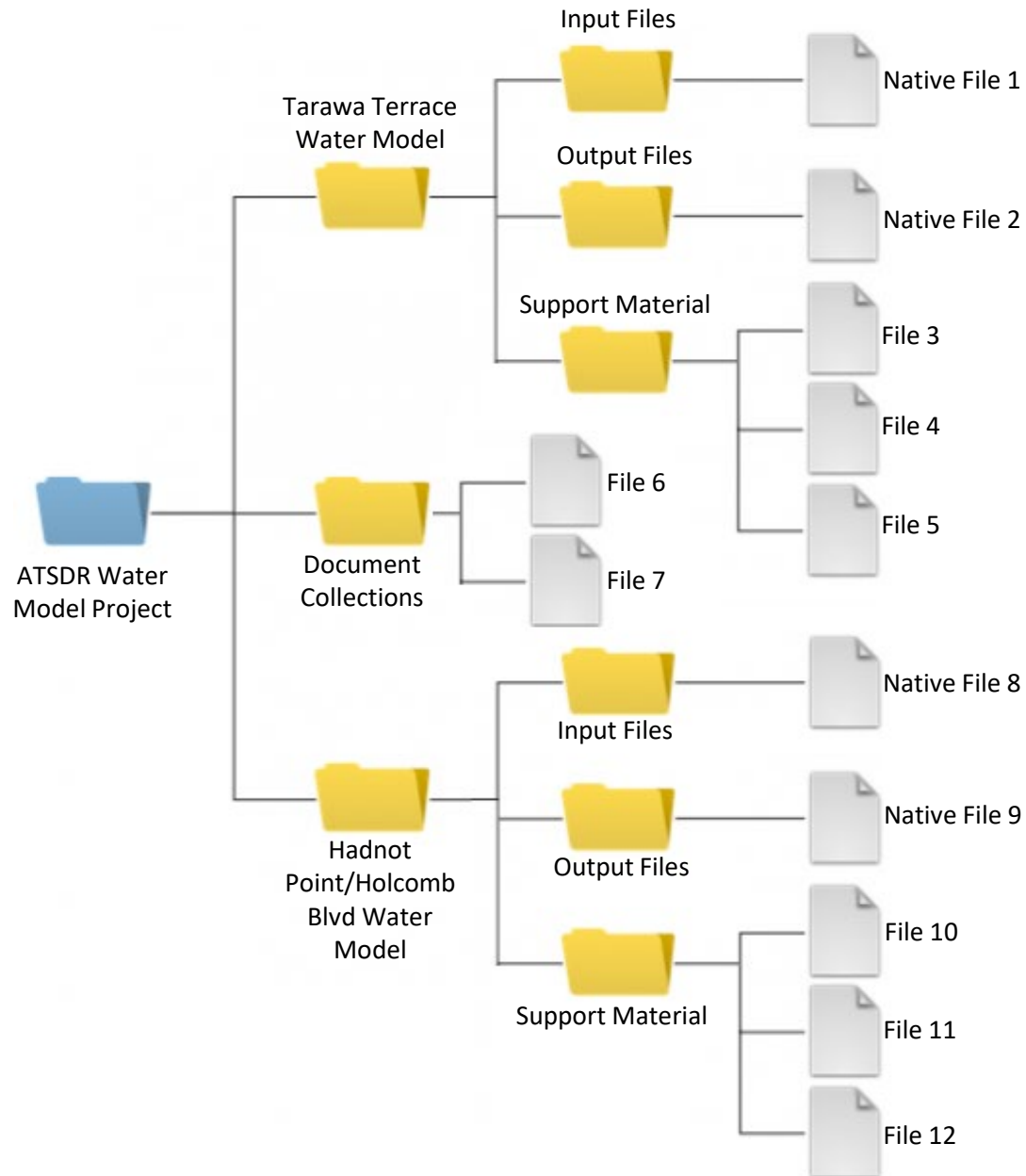


Tarawa Terrace
Water Model

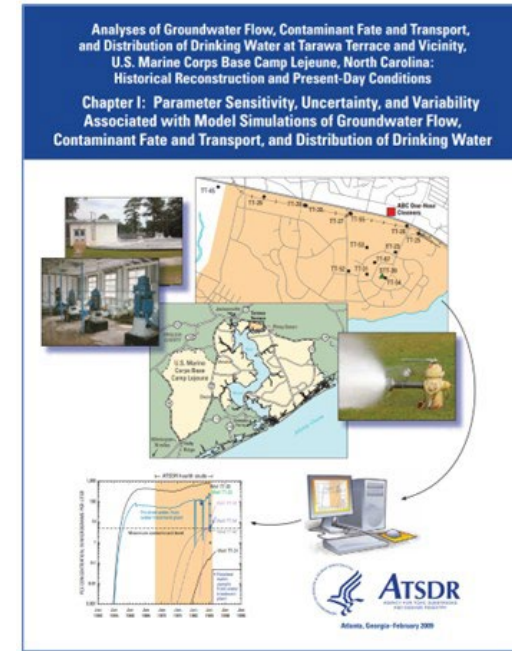


Hadnot Point – Holcomb Blvd
Water Model

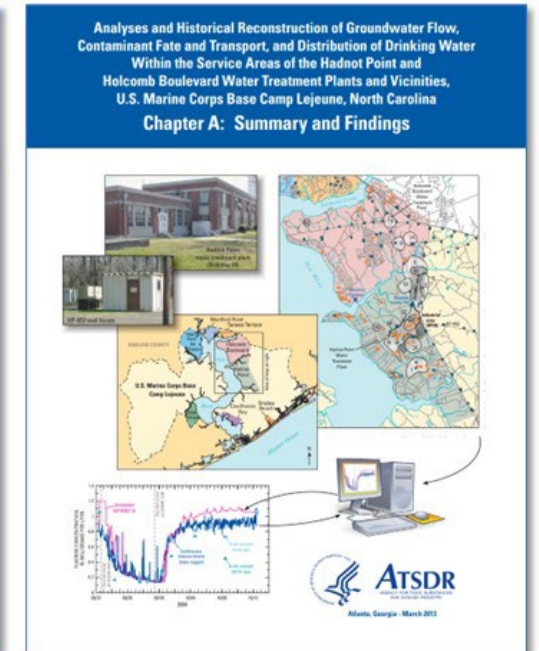
ATSDR Water Model Project



ATSDR Water Model Project



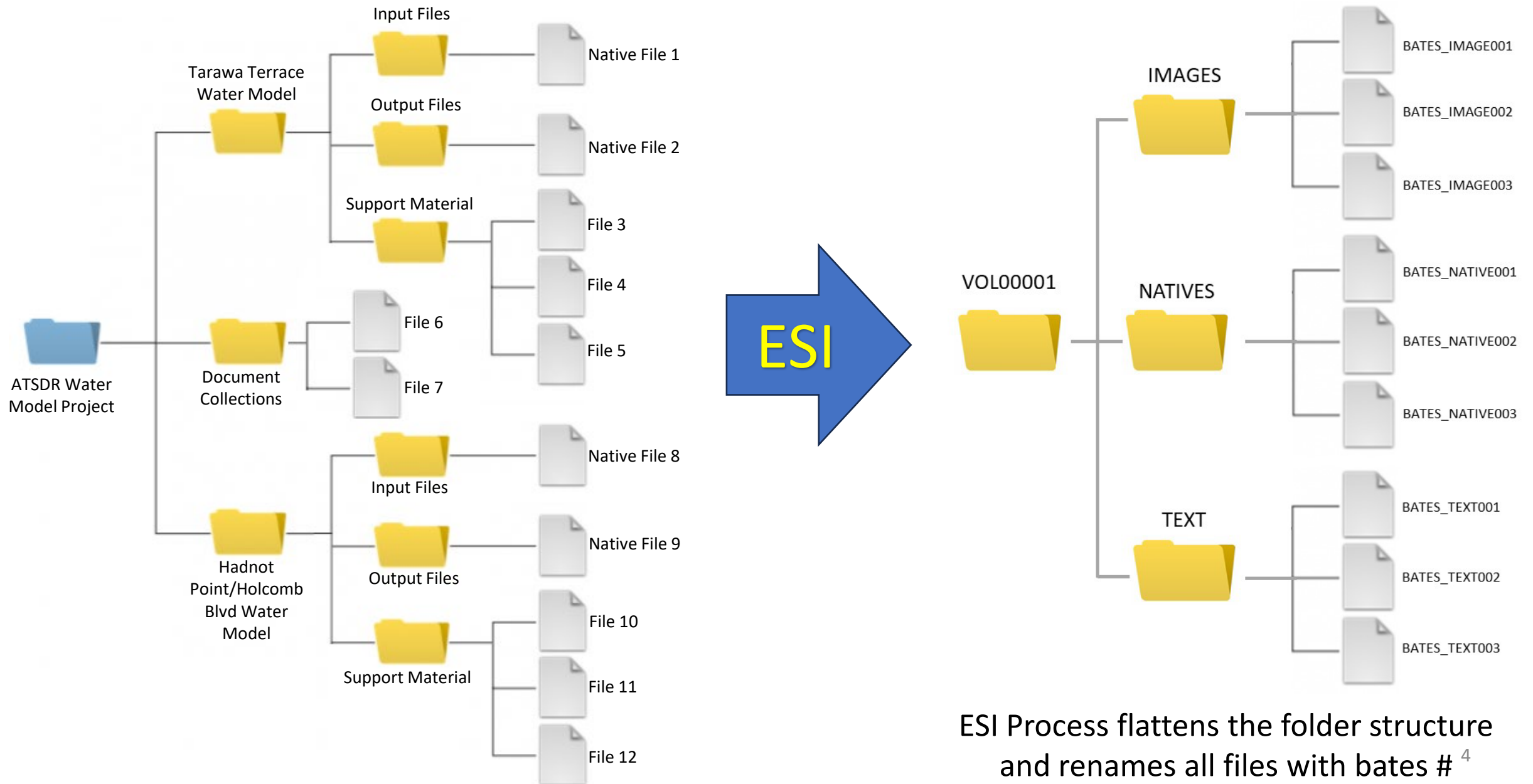
Tarawa Terrace
Water Model



Hadnot Point – Holcomb Blvd
Water Model

The graphic to the left represents the folder-subfolder-file structure of the ATSDR water Model Project. The actual structure will be much more extensive. ³

ATSDR Water Model Project



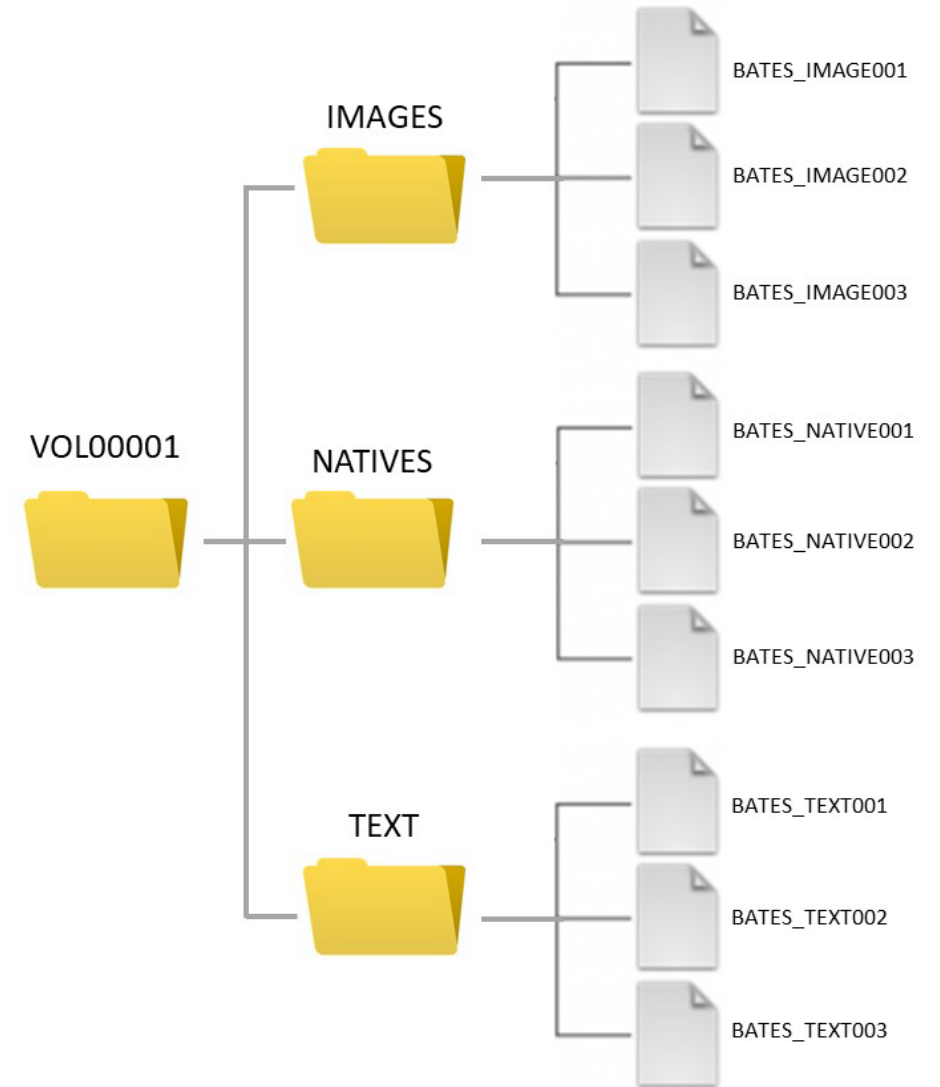
ATSDR Water Model Project

BEGDOC#	FILENAME
CLJA_WATERMODELING-0000000001	ChA FigA4.1_TCE HPIA layer1.pdf
CLJA_WATERMODELING-0000000002	Table1_ResultsSummary (002).docx
CLJA_WATERMODELING-0000000003	ChA FigA16.pdf
CLJA_WATERMODELING-0000000004	ChA FigA17.pdf
CLJA_WATERMODELING-0000000005	ChA FigA6.1_TCE HP landfill layer1.pdf
CLJA_WATERMODELING-0000000006	ChD FigD7-8_Bldg645 benzene USTP.pdf
CLJA_WATERMODELING-0000000008	ChA Fig13-14.pdf
CLJA_WATERMODELING-0000000010	ChA FigA5.1_benzene HPIA layer1.pdf
CLJA_WATERMODELING-0000000011	Camp Lejeune SVI_20170717.docx
CLJA_WATERMODELING-0000000012	ChA Sup3 FigS3.21_Pot surface.pdf
CLJA_WATERMODELING-0000000013	ChA FigA6.4_PCE HP landfill layer1.pdf

Bates File Name

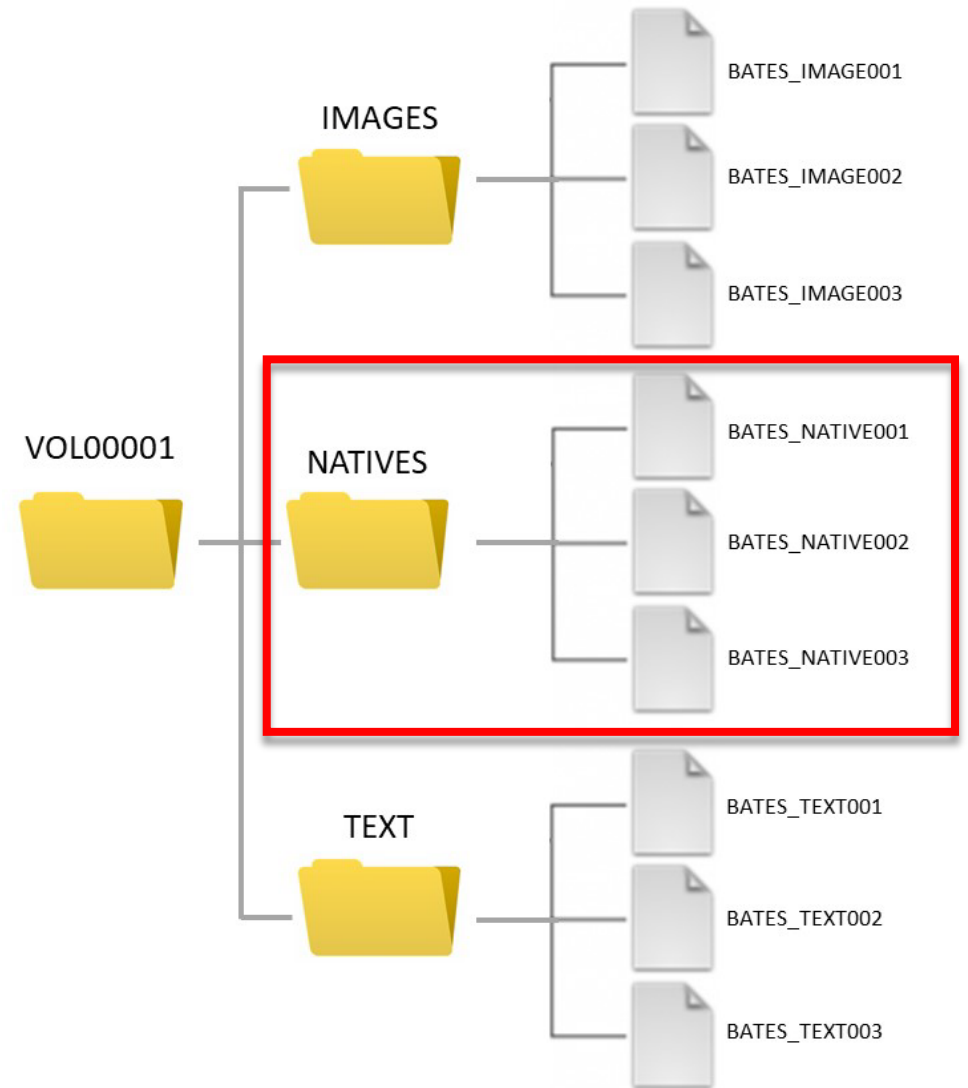
Original File Name

All project files are renamed according the bates prefix and numbering sequence. Native files would retain their file extensions.



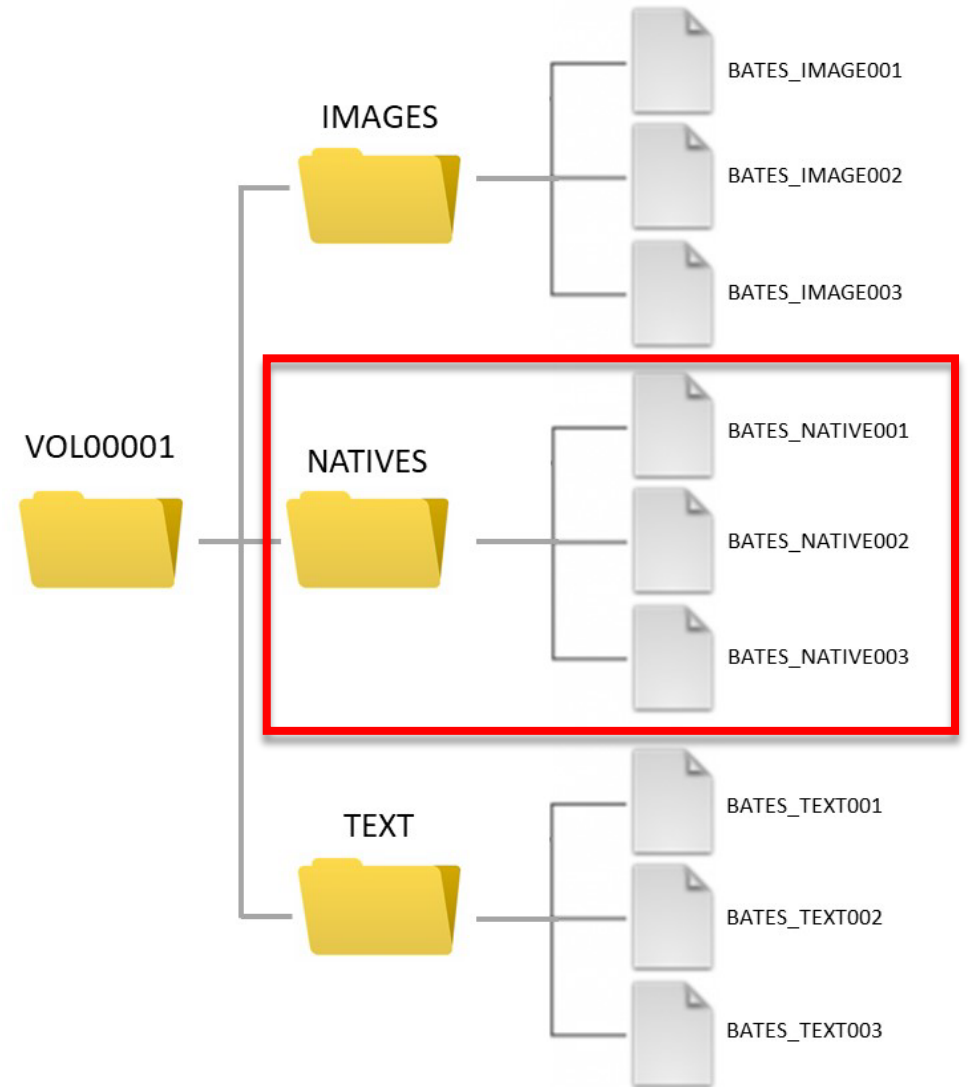
ATSDR Water Model Project

- Both parties agree the ATSDR Water Model Project should be processed according to the agreed upon ESI protocol
- Both parties agree the ESI Process will preserve the native file formats (file extensions)
- Both parties agree the ESI process will rename all native files and group them under a common “Native” folder
- Both parties agree the native files after being renamed and moved will not retain any links or other file/project associations they may have had



ATSDR Water Model Project

- The DOJ suggests that since the ESI process retains the native format all the plaintiffs' experts have to do is to access the new bates versions of each native file to do their analysis
- This is not accurate. Each native file is linked to the project file and other data files by name and location. Since the name and location have been changed those links are broken and would have to be relinked for the project be usable.
- This is not practical since the number of associations and links in projects of this type will range in the thousands to tens of thousands.



Native Project Demonstration

Geographic Information Systems (GIS)

Create a project—ArcGIS Pro | D | X

← ↻ 🏠 🔍 🌐 ⚙️ ☆ 📄 ⋮

https://pro.arcgis.com/en/pro-app/latest/get-started/create-a-project.htm

esri

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ArcGIS Pro

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Home Get Started Help Tool Reference Python SDK Migrate from ArcMap

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ArcGIS Pro quick-start tutorials

▼ Learn the basics

Introducing ArcGIS Pro

Navigate maps and scenes

Create a project

Add data to a project

Explore data

Author a map

> Visualize

> Manage and edit data

> Analyze

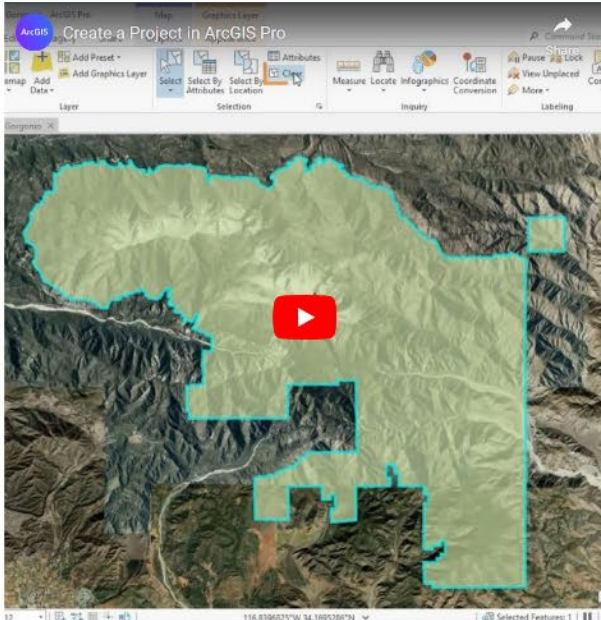
> Share

Create a project

ArcGIS Pro 3.2 | Other versions ▼ | Help archive

ArcGIS Pro helps you organize and manage the resources related to your work. To do this, it uses a project file (.aprx) as its default file type. An ArcGIS Pro project can contain maps, scenes, layouts, and other items. It can also contain connections to data stored in folders, databases, and servers. Maps, layers, and other GIS content can be added from portals such as your ArcGIS organization or ArcGIS Living Atlas of the World. Content you create in ArcGIS Pro can be shared to your portal.

Overview



The screenshot shows the ArcGIS Pro software interface. At the top, there's a title bar and a menu bar. Below the menu bar, there's a toolbar with various icons for map navigation and editing. The main area displays a map of a mountainous region with a red play button overlay in the center, suggesting a video tutorial. The map shows a green area, possibly a watershed or a specific study area, outlined in red. The bottom status bar shows coordinates and other map-related information.

In this topic

Overview

Create a project from a default template

Locate the study area

Add wilderness data to the map

Make a layer from a selected feature

Add critical habitat data to the map

Clip the critical habitat layer

Symbolize the layer

Tutorial project was created to demonstrate importance of maintaining file names and locations in the ATSDR Water Modeling Project

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Completed Tutorial in ArcGIS

The screenshot shows the ArcGIS desktop application interface. The main map area displays a satellite image of a mountainous region. Overlaid on the map is a green polygon outline representing a project area, and a red triangle marker indicating a specific location. The interface includes a top menu bar with options like Project, Map, Insert, Analysis, View, Edit, Imagery, Share, and Help. A left 'Contents' panel shows the project structure, including layers like 'San Gorgonio', 'CriticalHabitat', and 'World Imagery'. A right 'Catalog' panel shows the project's data sources, including 'San Gorgonio.gdb' and 'CriticalHabitat'. A bottom status bar displays the map's scale (1:205,020) and coordinates (116.7768272°W 34.2426248°N).

The red bounding box highlights the 'Contents' panel on the left side of the interface. This panel shows the project structure, including layers like 'San Gorgonio', 'CriticalHabitat', and 'World Imagery'. It also displays the 'Drawing Order' for the project, listing 'San Gorgonio' as the top layer, followed by 'CriticalHabitat' and 'World Imagery'.

The Catalog panel on the right side of the interface shows the project's data sources, including 'San Gorgonio.gdb' and 'CriticalHabitat'. It also displays the project's metadata, such as the project name 'San Gorgonio' and the project location 'San Gorgonio Mountain'.

The main map area displays a satellite image of a mountainous region. Overlaid on the map is a green polygon outline representing a project area, and a red triangle marker indicating a specific location. The map's scale is 1:205,020, and the coordinates are 116.7768272°W 34.2426248°N.

The red bounding box shows the different layers that are part of the project. The layers in this tutorial are the background (map), outline and the location marker.

Layer Data Sources

The screenshot shows the ArcGIS Desktop interface with a map of San Gorgonio. The 'Layer Properties: CriticalHabitat' dialog is open, and the 'Source' tab is selected. A red box highlights the 'Database' row in the 'Data Source' table, which shows the path 'C:\Create a project Tutorial\San Gorgonio.gdb'.

Data Source	
Data Type	File Geodatabase Feature Class
Database	C:\Create a project Tutorial\San Gorgonio.gdb
Name	CriticalHabitat
Alias	CriticalHabitat
ObjectID	32-bit
Feature Type	Simple
Geometry Type	Polygon
Coordinates have Z values	No

Database C:\Create a project Tutorial\San Gorgonio.gdb

The GIS software program creates a database where the data related to the layers are stored. The stored data includes the file name and folder/path information.

Layer Data Sources

The screenshot shows the ArcGIS Desktop interface with the 'Layer Properties: San Gorgonio Wilderness - Forest Service' dialog box open. The 'Source' tab is selected, displaying the data source information. A red box highlights the 'Database' and its path.

Database	C:\Create a project Tutorial\Data\Create_a_project.gdb
Name	National_Wilderness_Preservation_System
Alias	National_Wilderness_Preservation_System
ObjectID	32 bit

Below the highlighted table, the 'Extent' and 'Spatial Reference' sections are visible.

Tutorial File Tree

Folder PATH listing for volume Local Disk

Volume serial number is 9251-CD05

C:..

Create a project tutorial.url

San Gorgonio.aprx

San Gorgonio.atbx

Main Project File

+---backups

San Gorgonio.aprx

+---Data

SoCalCriticalHabitat.lyrx

Wilderness Areas in the United States.lyrx

Data Sources

+---Create_a_project.gdb

a00000001.gdbindexes

a00000001.gdbtable

...

timestamps

Geodatabase

Geodatabase files

+---GpMessages

2686144540022000

+---ImportLog

120c5c6f9ebb4e79b56d11083a5b70d7_Import.xml

+---Index

+---San Gorgonio

segments.gen

segments_j

_0.cfe

_0.cfs

...

_f.si

+---Thumbnail

-1265861962.jpg

-990349529.jpg

+---San Gorgonio.gdb

a00000001.gdbindexes

a00000001.gdbtable

a00000001.gdbtablx

a00000001.TablesByName.atx

a00000002.gdbtable

a00000002.gdbtablx

a00000003.gdbindexes

a00000003.gdbtable

a00000003.gdbtablx

...

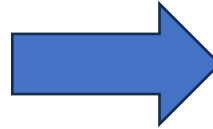
Geodatabase

Geodatabase files

This is the folder/file tree for the tutorial project showing the file locations (folders) and the numerous files created in this simple project.

Project Files Renamed and File Structure Flattened (typical ESI production)

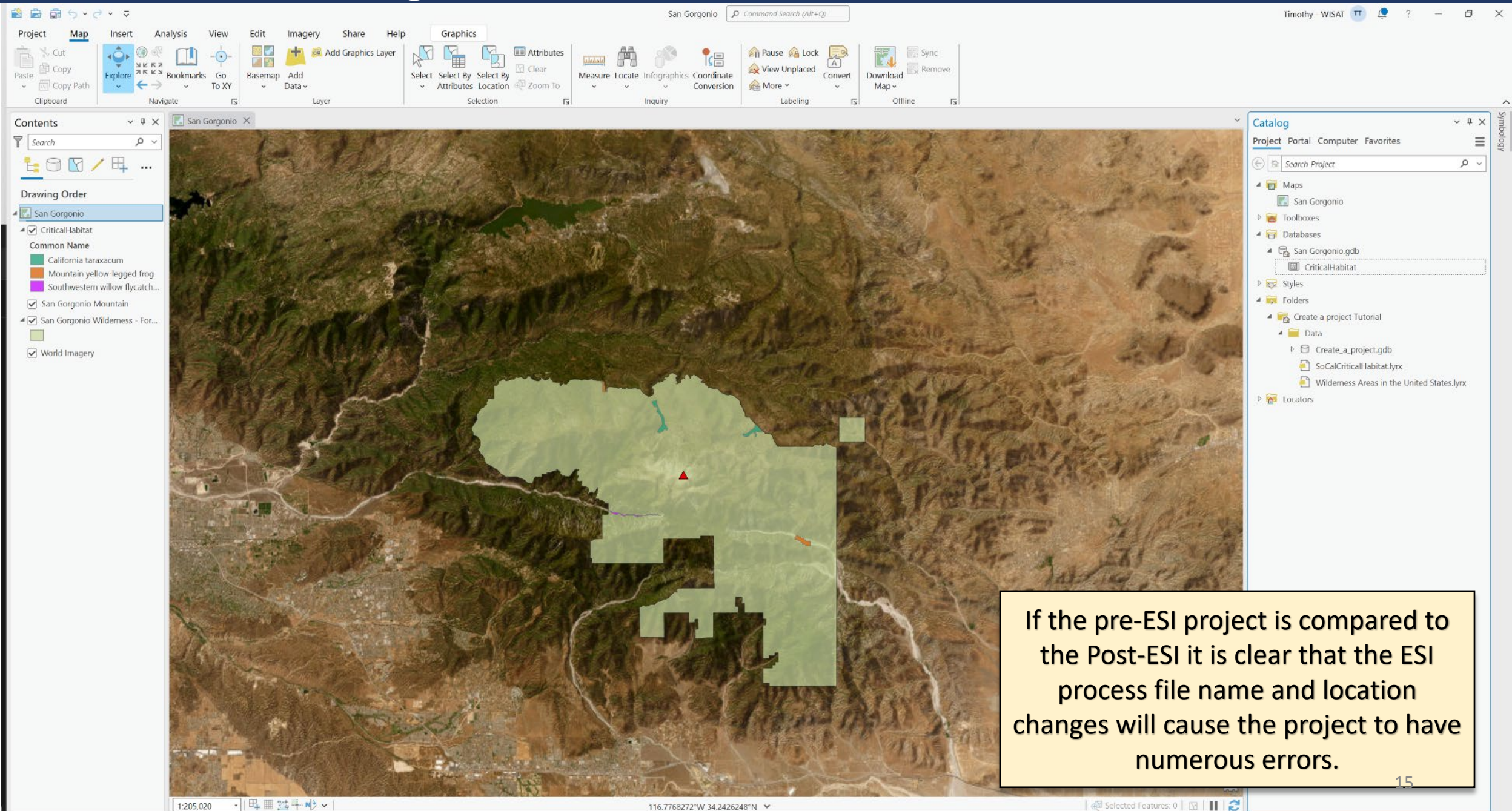
Folder PATH listing for volume Local Disk
Volume serial number is 9251-CD05
C:..
 Create a project tutorial.url
 San Gorgonio.aprx
 San Gorgonio.atbx
 +---backups
 San Gorgonio.aprx
 +---Data
 SoCalCriticalHabitat.lyrx
 Wilderness Areas in the United States.lyrx
 +---Create_a_project.gdb
 a00000001.gdbindexes
 a00000001.gdbtable
 ...
 timestamps
 +---GpMessages
 2686144540022000
 +---ImportLog
 120c5c6f9ebb4e79b56d11083a5b70d7_Import.xml
 +---Index
 +---San Gorgonio
 segments.gen
 segments_j
 _0.cfe
 _0.cfs
 ...
 _f.si
 +---Thumbnail
 -1265861962.jpg
 -990349529.jpg
 +---San Gorgonio.gdb
 a00000001.gdbindexes
 a00000001.gdbtable
 a00000001.gdbtablx
 a00000001.TablesByName.atx
 a00000002.gdbtable
 a00000002.gdbtablx
 a00000003.gdbindexes
 a00000003.gdbtable
 a00000003.gdbtablx



Folder PATH listing for volume Local Disk
Volume serial number is 9251-CD05
C:..
 bates_00000000.jpg
 bates_00000001.jpg
 bates_00000002.xml
 bates_00000003
 bates_00000004.gdbindexes
 bates_00000005.gdbtable
 bates_00000006.gdbtablx
 bates_00000007.gdbindexes
 bates_00000008.gdbtable
 bates_00000009.gdbtablx
 bates_00000010.atx
 bates_00000011.atx
 bates_00000012.gdbtable
 bates_00000013.gdbtablx
 bates_00000014.gdbtable
 bates_00000015.gdbtablx
 bates_00000016.gdbindexes
 bates_00000017.gdbtable
 bates_00000018.gdbtablx
 bates_00000019.gdbindexes
 bates_00000020.gdbtable
 bates_00000021.gdbtablx
 bates_00000022.freelist
 bates_00000023.gdbindexes
 bates_00000024.gdbtable
 bates_00000025.gdbtablx
 bates_00000026.horizon
 bates_00000027.spx
 bates_00000028.atx
 bates_00000029.atx
 bates_00000030.atx
 bates_00000031.atx
 bates_00000032
 bates_00000033
 bates_00000034
 bates_00000035
 bates_00000036
 bates_00000037
 bates_00000038
 bates_00000039
 bates_00000040
 bates_00000041
 bates_00000042
 bates_00000043
 bates_00000044.atx
 ...

The ESI creation process renames the files according a bates number and relocates the files to different folders.

Before ESI Processing



After ESI Processing: Missing Layers

The screenshot shows the ArcGIS Desktop interface. The main map area displays a satellite image of a mountainous region. The 'Contents' pane on the left is highlighted with a red box and shows the following layers:

- San Geronio
- ! Critical-Habitat
- Click to repair layer's data source:
- California taraxacum
- Mountain yellow-legged frog
- Southwestern willow flycatch...
- San Geronio Mountain
- ! San Geronio Wilderness - F...
- World Imagery

The 'Catalog' pane on the right shows the project structure:

- Project
- Portal
- Computer
- Favorites
- Search Project
- Maps
- Toolboxes
- Databases
- Styles
- Folders
- Locators

A text box in the bottom right corner states:

Broken links will be created when the project file names and locations are changed which will be flagged when trying to open the project.

After ESI Processing: Missing Layers

The screenshot displays the ArcGIS Desktop interface with a map of San Gorgonio. The 'Contents' pane on the left and the 'Drawing Order' pane in the center are highlighted with red boxes. Both panes show a list of layers, with 'CriticalHabitat' marked with a red exclamation mark icon, indicating a broken data source link. A tooltip over the 'CriticalHabitat' entry in the 'Drawing Order' pane reads: 'Click to repair layer's data source.' The 'Catalog' pane on the right shows the project structure, including 'Maps', 'Toolboxes', 'Databases', 'Styles', 'Folders', and 'Locators'. The status bar at the bottom indicates 'Selected Features: 0'.

Contents

Search

Drawing Order

San Gorgonio

- ☒ CriticalHabitat
- ☒ California taraxacum
- ☒ Mountain yellow-legged frog
- ☒ Southwestern willow flycatch...
- ☒ San Gorgonio Mountain
- ☒ San Gorgonio Wilderness - F...
- ☒ World Imagery

Click to repair layer's data source.

Drawing Order

San Gorgonio

- ☒ CriticalHabitat
- ☒ California taraxacum
- ☒ Mountain yellow-legged frog
- ☒ Southwestern willow flycatch...
- ☒ San Gorgonio Mountain
- ☒ San Gorgonio Wilderness - F...
- ☒ World Imagery

Click to repair layer's data source.

Catalog

Project Portal Computer Favorites

Search Project

- Maps
- Toolboxes
- Databases
- Styles
- Folders
- Locators

The red ! Indicate layers where the link to the source file or data is broken. In order to repair the project each link would have to be restored.

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After ESI Processing: Missing Layers

The screenshot shows the ArcGIS Desktop interface with a map of San Gorgonio. The map displays a brown, textured terrain. The interface includes a top menu bar (Project, Map, Insert, Analysis, View, Edit, Imagery, Share, Help) and a toolbar. The 'Contents' panel on the left is highlighted with a red box, showing a search bar and a list of layers. The 'Drawing Order' panel on the right is also highlighted with a red box, showing a list of layers with checkboxes. A tooltip is visible over the 'CriticalHabitat' layer in the Drawing Order panel, stating 'Click to repair layer's data source.' The 'Catalog' panel on the far right shows a tree view of project resources.

Contents Panel (Left):

- Search
- Layers
- San Gorgonio
- ☒ CriticalHabitat
- Click to repair layer's data source.
- California taraxacum
- Mountain yellow-legged frog
- Southwestern willow flycatch...
- ☒ San Gorgonio Mountain
- ☒ San Gorgonio Wilderness - F...
- ☒ World Imagery

Drawing Order Panel (Right):

- San Gorgonio
- ☒ ☐ CriticalHabitat
- Click to repair layer's data source.
- California taraxacum
- Mountain yellow-legged frog
- Southwestern willow flycatch...
- ☒ San Gorgonio Mountain
- ☒ ☐ San Gorgonio Wilderness - F...
- ☒ World Imagery

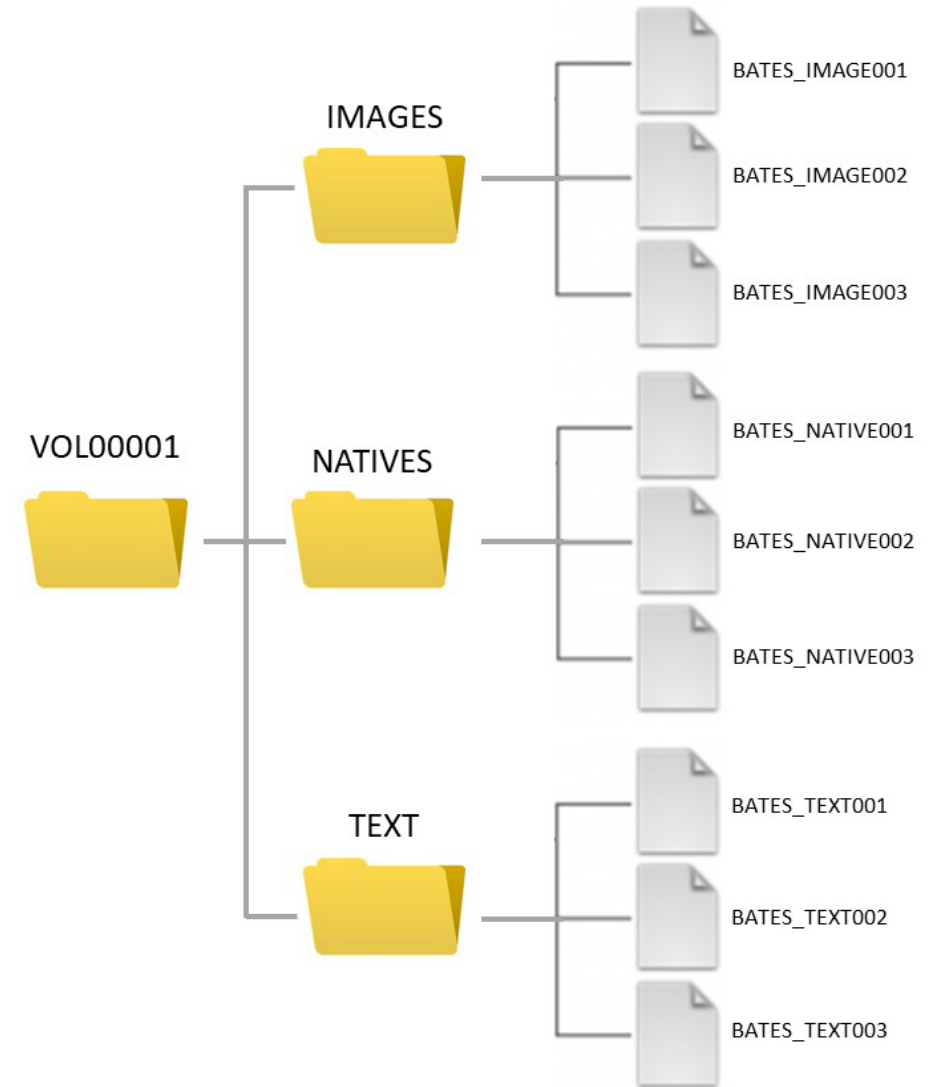
Text Box (Bottom Right):

In a simple project like this tutorial it is not that difficult to restore a few links but in the ATSDR GIS project there will be 100's to 1,000's of layers with broken links if the project is produced using ESI methodology.

ATSDR Water Model Project

- To rectify this the DOJ wants to provide a “map” of the original folder-subfolder-file structure to allow the plaintiffs to recreate the ARSDR Water Model Project
- The “map” is a listing of the original folder paths and file locations from the ATSDR water Model Project. A sample of which is shown below:

#TYPE Selected.System.IO.DirectoryInfo
FullName
E:\2023-014_DOJ\EDRP\CCEHIP_ATSDR_EDRP02\Site_Files_MLM
E:\2023-014_DOJ\EDRP\CCEHIP_ATSDR_EDRP02\Site_Files_MLM\Camp Lejeune NC
E:\2023-014_DOJ\EDRP\CCEHIP_ATSDR_EDRP02\Site_Files_MLM\Camp Lejeune NC\Soil Vapor Intrusion
E:\2023-014_DOJ\EDRP\CCEHIP_ATSDR_EDRP02\Site_Files_MLM\Camp Lejeune NC\Soil Vapor Intrusion\Camp Lejeune SVI_20170717.docx
E:\2023-014_DOJ\EDRP\CCEHIP_ATSDR_EDRP02\Site_Files_MLM\Camp Lejeune NC\Soil Vapor Intrusion\ChA Fig13-14.pdf
E:\2023-014_DOJ\EDRP\CCEHIP_ATSDR_EDRP02\Site_Files_MLM\Camp Lejeune NC\Soil Vapor Intrusion\ChA FigA16.pdf
E:\2023-014_DOJ\EDRP\CCEHIP_ATSDR_EDRP02\Site_Files_MLM\Camp Lejeune NC\Soil Vapor Intrusion\ChA FigA17.pdf
E:\2023-014_DOJ\EDRP\CCEHIP_ATSDR_EDRP02\Site_Files_MLM\Camp Lejeune NC\Soil Vapor Intrusion\ChA FigA4.1_TCE HPIA layer1.pdf
E:\2023-014_DOJ\EDRP\CCEHIP_ATSDR_EDRP02\Site_Files_MLM\Camp Lejeune NC\Soil Vapor Intrusion\ChA FigA5.1_benzene HPIA layer1.pdf
E:\2023-014_DOJ\EDRP\CCEHIP_ATSDR_EDRP02\Site_Files_MLM\Camp Lejeune NC\Soil Vapor Intrusion\ChA FigA6.1_TCE HP landfill layer1.pdf
E:\2023-014_DOJ\EDRP\CCEHIP_ATSDR_EDRP02\Site_Files_MLM\Camp Lejeune NC\Soil Vapor Intrusion\ChA FigA6.4_PCE HP landfill layer1.pdf
E:\2023-014_DOJ\EDRP\CCEHIP_ATSDR_EDRP02\Site_Files_MLM\Camp Lejeune NC\Soil Vapor Intrusion\ChA Sup3 FigS3.21_Pot surface.pdf
E:\2023-014_DOJ\EDRP\CCEHIP_ATSDR_EDRP02\Site_Files_MLM\Camp Lejeune NC\Soil Vapor Intrusion\ChA TabA7-8_pot&doc sources.pdf
E:\2023-014_DOJ\EDRP\CCEHIP_ATSDR_EDRP02\Site_Files_MLM\Camp Lejeune NC\Soil Vapor Intrusion\ChD FigD7-8_Bldg645 benzene USTP.pdf
E:\2023-014_DOJ\EDRP\CCEHIP_ATSDR_EDRP02\Site_Files_MLM\Camp Lejeune NC\Soil Vapor Intrusion\DLZ4_DRAFT_Camp Lejeune VI Work Plan_modeling and
E:\2023-014_DOJ\EDRP\CCEHIP_ATSDR_EDRP02\Site_Files_MLM\Camp Lejeune NC\Soil Vapor Intrusion\DLZ4_DRAFT_Camp Lejeune VI Work Plan_modeling and
E:\2023-014_DOJ\EDRP\CCEHIP_ATSDR_EDRP02\Site_Files_MLM\Camp Lejeune NC\Soil Vapor Intrusion\Table1_ResultsSummary (002).docx

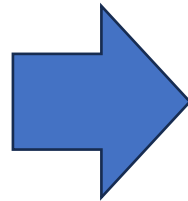


ATSDR Water Model Project

- To accomplish this the plaintiffs would have to first rename all the bates files back to their original file names using a batch rename process

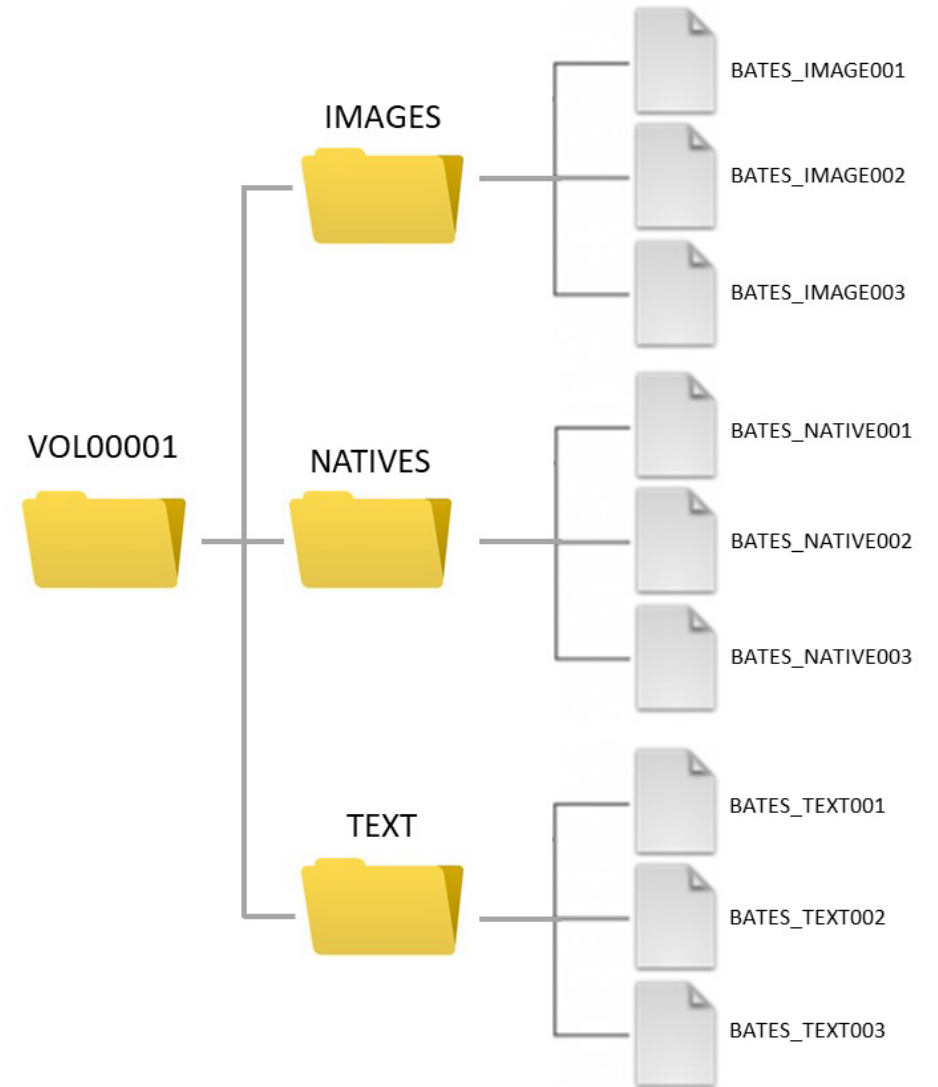
BEGDOC#
CLJA_WATERMODELING-0000000001
CLJA_WATERMODELING-0000000002
CLJA_WATERMODELING-0000000003
CLJA_WATERMODELING-0000000004
CLJA_WATERMODELING-0000000005
CLJA_WATERMODELING-0000000006
CLJA_WATERMODELING-0000000008
CLJA_WATERMODELING-0000000010
CLJA_WATERMODELING-0000000011
CLJA_WATERMODELING-0000000012
CLJA_WATERMODELING-0000000013

Bates File Name



FILENAME
ChA FigA4.1_TCE HPIA layer1.pdf
Table1_ResultsSummary (002).docx
ChA FigA16.pdf
ChA FigA17.pdf
ChA FigA6.1_TCE HP landfill layer1.pdf
ChD FigD7-8_Bldg645 benzene USTP.pdf
ChA Fig13-14.pdf
ChA FigA5.1_benzene HPIA layer1.pdf
Camp Lejeune SVI_20170717.docx
ChA Sup3 FigS3.21_Pot surface.pdf
ChA FigA6.4_PCE HP landfill layer1.pdf

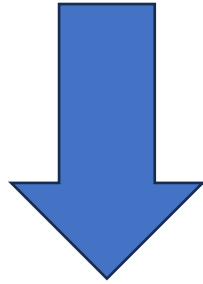
Original File Name



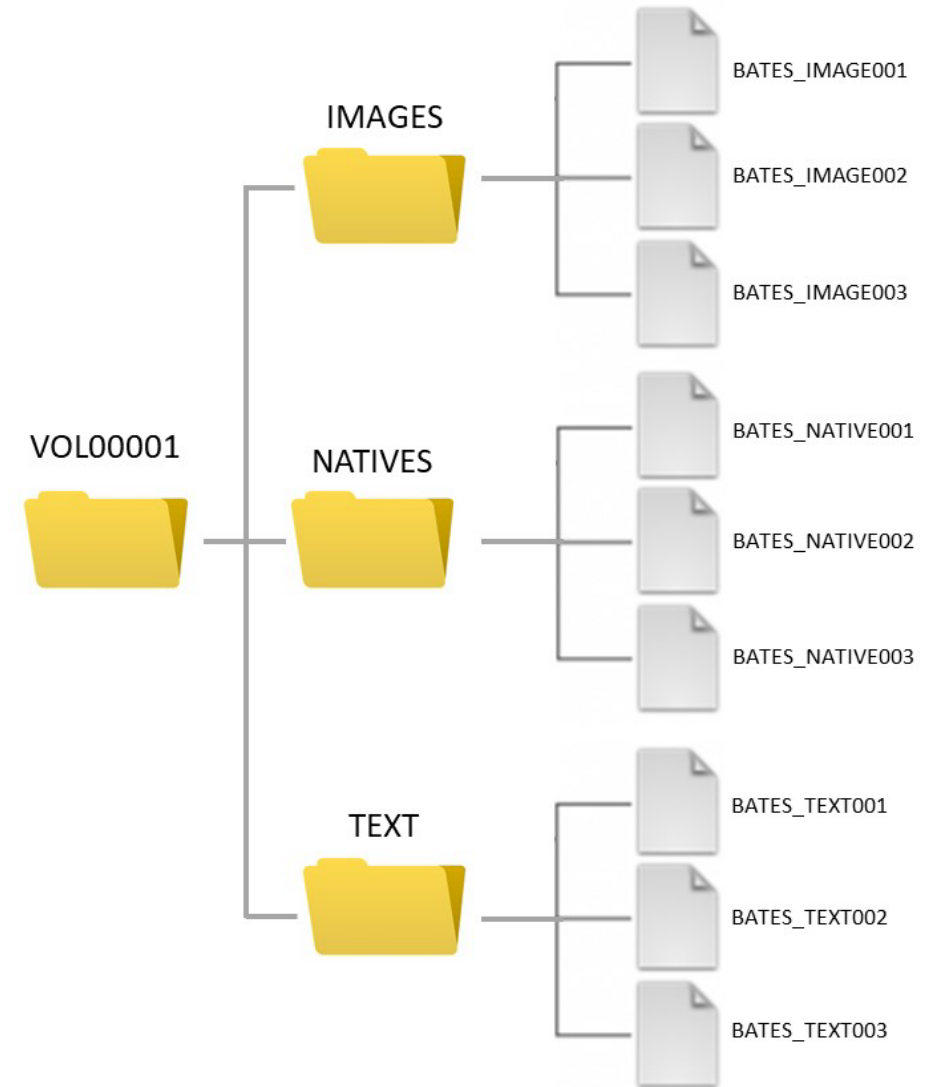
ATSDR Water Model Project

- The next step would be to recreate to folder-subfolder structure of the ATSDR Water Model Project

E:\2023-014_DOJ\EDRP\CCEHIP_ATSDR_EDRP02\Site_Files_MLM
E:\2023-014_DOJ\EDRP\CCEHIP_ATSDR_EDRP02\Site_Files_MLM\Camp Lejeune NC
E:\2023-014_DOJ\EDRP\CCEHIP_ATSDR_EDRP02\Site_Files_MLM\Camp Lejeune NC\Soil Vapor Intrusion



Hundreds to thousands of additional folders-subfolders would have to be recreated through a batch process

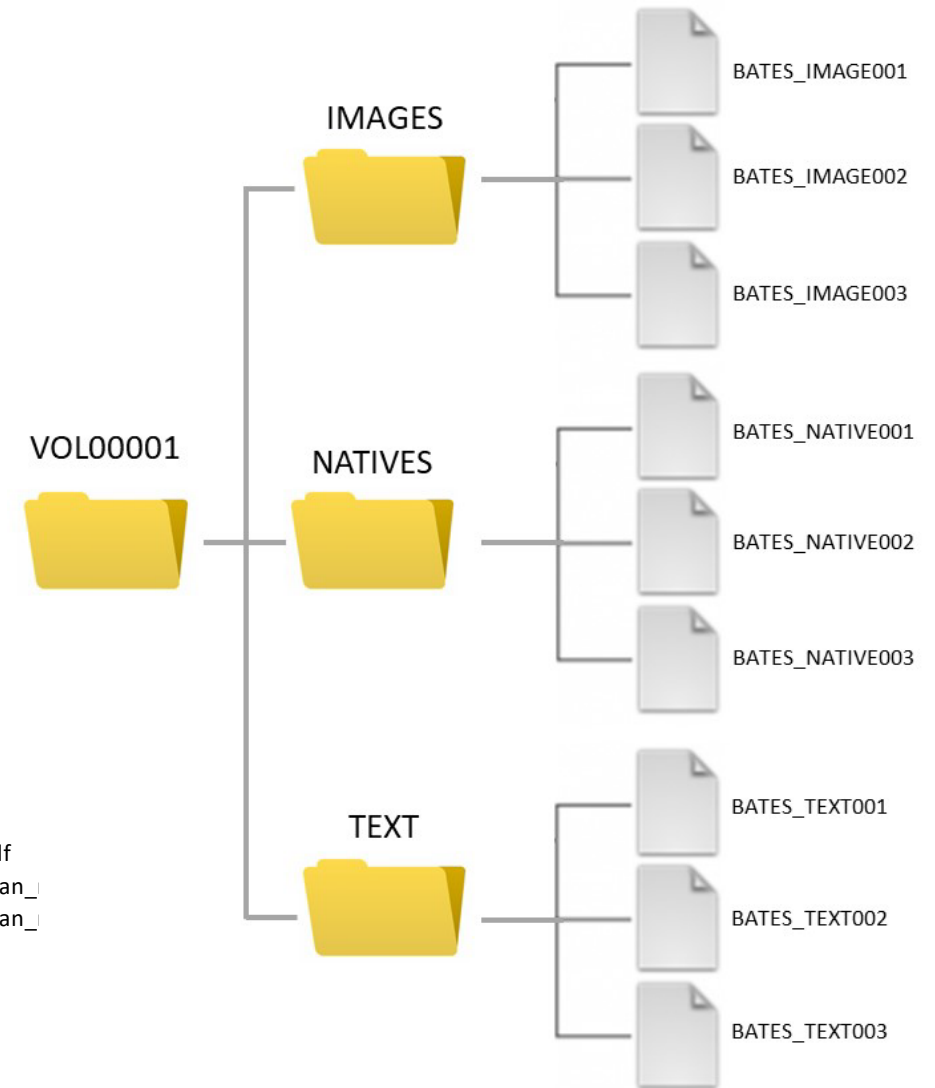


ATSDR Water Model Project

- Once the original folder-subfolder structure has been recreated the renamed files would have to be moved to their original location through a batch process

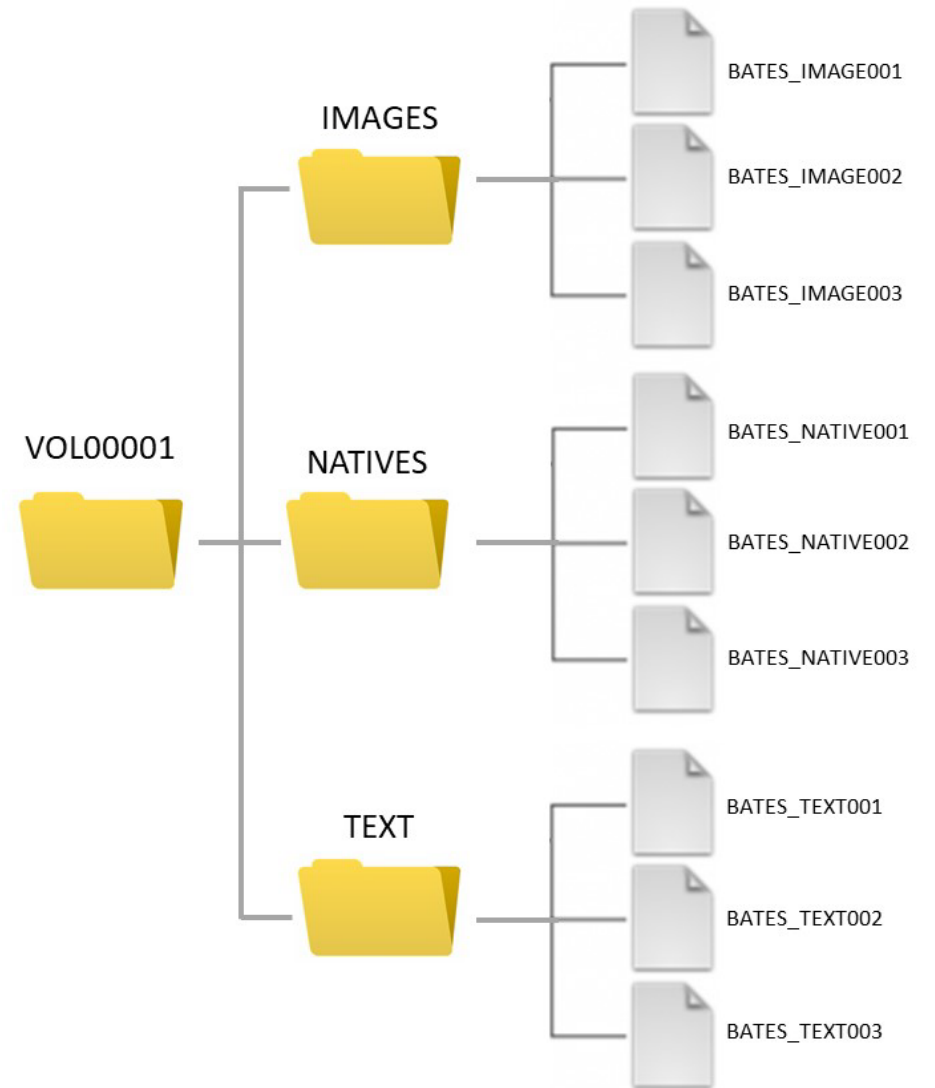
E:\2023-014_DOJ\EDRP\CCEHIP_ATSDR_EDRP02\Site_Files_MLM
E:\2023-014_DOJ\EDRP\CCEHIP_ATSDR_EDRP02\Site_Files_MLM\Camp Lejeune NC
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- The project would then have to be tested to verify all native files have been restored



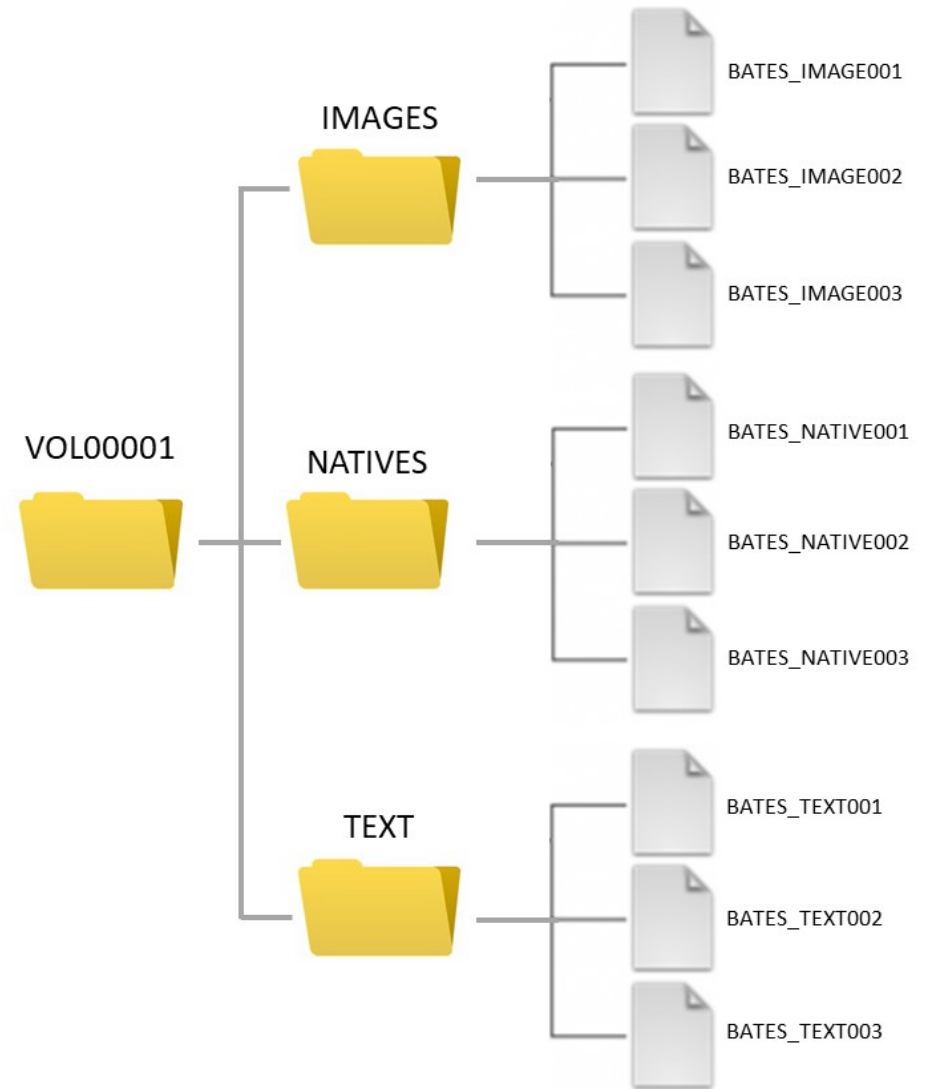
ATSDR Water Model Project

- The plaintiffs are requesting the DOJ to simply clone the ATSDR Water Model Project onto a suitable hard drive and provide that instead of requiring the rebuilding of the entire project through the steps previously outlined.
- The end result is the same: The plaintiffs have a functioning copy of the project and can move forward in their evaluation of the material.
- The difference is that the unnecessary step of having to rebuild the project is eliminated which saves time, reduces cost and eliminates the chance of errors being introduced during the tear down – rebuild process.



ATSDR Water Model Project

- When asked why they can't clone the project the DOJ raises the issue that if the plaintiffs' experts use the files in the original native format that it will create confusion in a deposition or other similar circumstance.
- But contrary to this they offer the plaintiffs the ability to recreate the original project using their supplied "map" which is the same thing as providing plaintiffs a clone of the project.
- The DOJ fails to acknowledge that the ESI bates version of the project allows both parties to cross reference original file names to the corresponding bates file version.



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